UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 0 1 2019

REPLY TO THE ATTENTION OF

ECW-15J

CERTIFIED MAIL 7009 1680 0000 7646 1153
RETURN RECEIPT REQUESTED

Ex. 6 (Personal Privacy)
Ex. 6 (Personal Privacy) Family Farm
Ex. 6 (Personal Privacy)

Subject: EPA Inspection Report – Ex. 6 (Personal Privacy) Family Farm

Dear Ex. 6 (Personal Privacy):

Enclosed, please find a copy of the U.S. Environmental Protection Agency Inspection Report for the inspection conducted by the EPA at the Ex. 6 (Personal Privacy) Family Farm on April 30, 2019. The purpose of the EPA inspection was to evaluate the Ex. 6 (Personal Privacy) Family Farm's compliance with the Clean Water Act and its Administrative Order (Docket Number V-W-10-AO-14). Should you find anything in the report that you disagree with, please provide a detailed response.

Based on the information you have provided regarding the requirements of the Administrative Order (AO) and the inspection conducted by the EPA on April 30, 2019, the U.S. Environmental Protection Agency believes that you have satisfied the terms of AO and EPA anticipates no further action on the noncompliance EPA observed during the November 2009 inspection and considers the AO to be closed. Thank you for your efforts to protect water quality.

If you have any questions, please contact Joan Rogers of my staff at (312) 886-2785.

Sincerely,

Michael D. Harris

Michael D. Harris
Acting Division Director
Enforcement and Compliance Assurance Division

Enclosures

cc: Linda Wong, Illinois EPA
Jim Miles, Illinois EPA

CWA COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5

Purpose: Compliance Evaluation Inspection

Facility:
Ex. 6 (Personal Privacy) Family Farm
Ex. 6 (Personal Privacy)
Jo Daviess County
Ex. 6 (Personal Privacy)

NPDES Permit Number:
N/A

Date of Inspection:
April 30, 2019

EPA Representatives:
Joan Rogers, Environmental Scientist 312-886-2785
rogers.joan@epa.gov

Cheryl Burdett, Life Scientist 312-886-1463
Burdett.cheryl@epa.gov

State Representatives:
Linda Wong 847-294-4688
Linda.wong@illinois.gov

Facility Representatives:
Ex. 6 (Personal Privacy) Owner
Ex. 6 (Personal Privacy) Owner

Report Prepared by:
Joan Rogers, Environmental Scientist

Report Date: June 24, 2019

Inspector Signature: Joan A. Rogers

Approver Name and Title: Ryan Bahr, Chief, Water Enforcement and Compliance Assurance Branch, Section 2

Approver Signature: for

Approval Date: 6/28/19

1. BACKGROUND

The purpose of this report is to describe, evaluate and document the [redacted] Family Farm's compliance with the Clean Water Act (CWA) at its Stockton, Illinois facility on April 30, 2019 and its compliance with an Administrative Order (Docket Number V-W-10-AO-14) issued by the EPA on September 13, 2009. This inspection was performed pursuant to Section 308(a) of the Federal Water Pollution Control Act, as amended.

[redacted] Family Farm is a cattle facility that confines approximately 700 beef cattle year-round. On the day of the inspection, the facility had 720 steers and because of this number, the facility is considered to be a medium sized Animal Feeding Operation (AFO).

Precipitation that lands on the production area would flow to the south toward Welch Road. A culvert under Welch Road conveys the flow to a hillside. Approximately 0.4 miles down the hillside, there is an intermittent unnamed stream. This stream flows to the west and becomes perennial in approximately one mile. It then joins with the flow of the perennial waters of Welch Hollow before flowing into the Apple River.

EPA conducted an inspection on November 17, 2009. During that inspection, EPA observed and documented discharges from the production area through man-made conveyances. The facility was then determined to be a medium sized Concentrated Animal Feeding Operation (CAFO). EPA issued an Administrative Order (Order) to [redacted] Family Farm on September 13, 2010 (Docket Number V-W-10-AO-14). In the Order, the EPA required the facility to eliminate all discharges, develop a Comprehensive Nutrient Management Plan (CNMP) and apply for a National Pollutant Discharge Elimination System (NPDES) Permit.

Since the Order was issued, the [redacted] Family Farm owners provided documentation to EPA that it eliminated the discharges, developed a CNMP, but the facility did not apply for an NPDES Permit. Since a medium sized facility is not considered a CAFO if it does not have any discharges through any man-made conveyances, it would not need to apply for a permit. EPA decided to conduct a compliance inspection to verify. If the facility is observed by the EPA to be in compliance with the CWA, EPA planned to close out the Order.

2. SITE INSPECTION

Table 1: Site Entry

Arrival Time:	10:23 A.M.
Temperature:	45 °F
Precipitation:	Light Rain.
Presented credentials?	Yes.
Credentials presented to whom and at what time?	The owners of [redacted] Family Farm.

Was an opening conference held? With whom?	Yes, with the owners.
If photographs or documents were taken, does the facility consider any to be Confidential Business Information (CBI)?	No.
Which information does the facility consider to be CBI?	None.
EPA vehicle parked in approved location?	Yes.
Location where EPA vehicle was parked?	Across from the Machine Shed.
Disposable boots worn?	Yes.
Other bio-security measures taken:	State veterinarian was contacted prior to the inspection to verify that there were no outbreaks of cattle diseases in the area. EPA had not been on any other facilities with animals in the previous seven days.

2.1 Records Review (The following Records Review tables reflect information provided before the walk-through of the facility, unless otherwise noted.)

Table 2: Documents

Checklist(s) Used
R5 CAFO Boilerplate Inspection Report as Checklist.
Facility Documents Reviewed:
Soil Test Analysis.

Table 3: Facility Description

Type of Animal	**Number of Animals**	**Capacity**	**Type of Confinement**
Beef Cattle	720 (some are calves)	720	Barns and open lots.
Minimum Number of Animals in previous 5 years:			720 beef cattle.
Maximum Number of Animals in previous 5 years:			720 beef cattle.
Number of Animals that are stabled/confined and/or fed/maintained for 45 days or more in previous 12 months:			720 beef cattle.
Amount of Liquid Manure Generated per year:			2.5 million gallons.
Amount of Solid Manure Generated per year:			2500 tons.
Name of Certified Livestock Manager for facility: (if 300 animal units or greater):			[redacted]
Does the facility have an NPDES Permit?			No.
SIC or NAICS code:			0211.
CAFO Designation/Defined Date (If a designated CAFO)			Defined as a CAFO in November 2009 by EPA.

CAFO Designation/Defined Reason (If a designated CAFO)	Discharge of pollutants through a man-made conveyance.
Do animals have direct access to WOUS?	Yes, when on pasture.
Are crops, vegetation, forage growth, or post harvest residues sustained in the normal growing season over any portion of the lot or facility where animals are kept?	Yes.
What is the area (acres) of the production area?	Owners did not know offhand.
What is the area (acres) of the pasture?	Owners did not know offhand.
How many employees (not counting family members)?	None.
Other facilities under common ownership:	
Ex. 6 (Personal Privacy) arm facility.	

Table 4: Livestock Waste Storage

Type of Storage	Storage Capacity	Type of Liner	Depth Markers Present	Last Time Waste was Removed	Amount of Waste Removed	Days of Storage
Earthen Storage Structure	5 million gallons	Clay	No	Fall 2018	2.0 million gallons	3 years
Settling Basin	Approximately 2000-3000 gallons	Concrete	None	Unknown	2000-3000 gallons	Depends on the weather.
Bed Pack	Unknown	None	None	Fall 2018	Unknown	6 months
Records at site of storage structure design?				EPA did not ask for this.		
Is manure stored for the short term? If yes, describe where it is stored, how it is drained and where it drains to.				Yes, in the Settling Basin. Manure and process wastewater is held in the settling basin until the liquids are released to the Solids Separation Basin.		
Are records kept of the level of manure in the storage structures?				No.		
When was the last time a storage structure was emptied, either partially or completely?				Fall 2018.		
What amount of manure or process wastewater was removed the last time the storage structure was emptied, either partially or completely?				2.0 million gallons.		
Do the facility personnel inspect and keep records of all diversion devices?				Inspect but no records are kept.		
Do the facility personnel inspect and keep records of all impoundments?				Inspect but no records are kept.		

Do the facility personnel inspect and keep records of all the water lines?	Inspect but no records are kept.
Do the facility personnel perform routine visual inspections and keep records of the production area?	Inspect but no records are kept.
Does the waste storage system have a managed outfall or discharge point?	No.
Has the facility had any documented discharges of livestock waste to surface water in the past year?	No.
Are there safety devices installed around any manure storage ponds? (Barriers at the end of manure push off platforms, fences around pond, signage.)	No.

Table 5: Livestock Waste Management

Describe the way manure is collected and disposed of at the facility:	
The freestall barn is scraped daily to a middle pit. Manure and process wastewater is pumped from the pit to the pond.	
Describe the way used bedding is collected and disposed of at the facility:	
The bed pack in the barns is removed as needed and land applied.	
Are mortality records kept?	Yes.
Describe the way mortalities are managed at the facility:	
If mortality cannot be salvaged as food for the facility owners, it is rendered.	
What type of method is used to provide drinking water for the animals?	Drinkers with a float system are used to provide water for the animals.
Describe the way spilled drinking water is collected and disposed of at the facility:	
Spilled drinking water is handled in the same manner as the manure.	
Describe the way mist cooling water is collected and disposed of at the facility:	
No mist cooling system is used.	
Describe how chemicals are stored and how used or spilled chemicals are collected and disposed of at the facility:	
There are no liquid chemicals, only bags of Copper Sulfate for footbaths.	
Describe the way water that has been used to wash/flush barns is collected and disposed of at the facility:	
Barns are not washed or flushed.	
Describe the way feed is contained and how runoff from feed is collected and disposed of at the facility:	
Corn silage is stored in a bunker and covered with a tarp. Wet distillers feed products and minerals are kept in the Commodity Shed under roof. High moisture corn is kept in a silo.	

If a dairy, describe how process wastewater from the plate cooler water is collected and disposed of at the facility:
Not a dairy.

Table 6: Land Application and Disposal of Manure and Process Wastewater

Does the facility perform and keep records of the manure testing?	Yes.
When was the last time a sample was taken of the manure and/or process wastewater?	Fall 2018.
Describe the process to take the manure and/or process wastewater sample.	Samples are taken from each load while pumping into the tanker.
Number of acres available for land application:	730 acres. Facility owners only apply on 500 acres.
Are land application records kept?	Yes.
Who applies the manure and process wastewater to the fields?	The facility personnel do their own land application of manure.
Are weather conditions at time of application kept? (24 before – 24 after)	No, but the facility owners note the conditions informally.
Does the facility perform and keep records of the soil testing?	Yes. Soil testing was due in the spring of 2019.
Is manure transferred off-site to another party?	No.
Are manure transfer records maintained?	N/A.
Do facility personnel perform periodic inspection of land application equipment?	Yes.

Table 7: Receiving Surface Waters

Describe the surface flow pathways:
At the bottom of the hillside is an intermittent unnamed stream. This stream flows to the west and becomes perennial in approximately one mile. It then joins with the flow of the perennial waters of Welch Hollow before flowing into the Apple River. West of the Silage Pad is the headwaters to another intermittent unnamed stream which flows to the west where it becomes a perennial unnamed stream. The flow in the unnamed streams goes approximately 3.5 miles before reaching perennial Apple River to the west.

How many months out of the year is there flow in the nearest surface water pathway:	There is a spring at the bottom of the hillside to the south. Downstream of the spring, the water flows year-round. Upstream, it flows only about 8 months out of the year. The headwaters of the intermittent unnamed stream to the west of the Silage Pad only has flow in it when it rains.
Are there any storm water pathways entering the facility?	No.
Are there any clean water ponds on site?	No.
What is the name of the first waterway that is identified as a Traditional Navigable Water (TNW) for surface flow from the facility?	Mississippi River.
Is the surface water pathway nearest to the facility considered to be ephemeral, intermittent or perennial?	Intermittent.
Has the surface water pathway nearest to the facility been assessed for water quality?	Welch Hollow has been assessed for Aquatic Life and its status is listed as "Good." The Apple River has been assessed for water quality and is listed on the 2012 303d list as impaired for fecal coliform.

Table 8: Nutrient Management Plan

NMP on site?	Yes. EPA did not review the CNMP on the day of the inspection. [redacted] Ex. 6 (Personal Privacy) [redacted]

Table 9: Land Application Records (details of the records reviewed)

EPA did not review any land application records on the day of the inspection.

Table 10: Facility Records (details of the records reviewed)

EPA reviewed the soil test results from 2011. Several of the [redacted] fields had phosphorus levels that were listed as "high". One field was listed as "very high".

Table 11: NPDES Permit

[redacted] Family Farm does not have an NPDES Permit.

2.2 Walkthrough of the Facility

EPA concluded the checklist portion of the inspection at 11:36 A.M. and immediately began the walkthrough portion of the inspection. See Attachment A - [redacted] Family Farm Photo Log for photos from the walkthrough and description of observations.

2.3 Closing Conference and Post-Inspection

Table 12: Post Walk-Through

Was a closing conference held? With whom? Yes, with the facility owners.	
Were specific Areas of Concern discussed with facility personnel?	Yes.
Were any deficiencies or areas of concern addressed or fixed during the inspection? No.	
Compliance assistance materials given to facility personnel: None were provided.	
Exit Time:	1:15 P.M.
Disposable Boots Left at Facility?	Yes.
Vehicle Washed after leaving facility?	Yes.
Date and Time that vehicle was washed:	4/30/19 approximately 4:00 P.M.

Table 13: Waterway Documentation

List the pathway taken by EPA inspectors to document the waterway at the facility.
EPA observed the intermittent unnamed tributary at the south end of the hillside.

Table 14a: Sampling Information

Were samples taken?	No.

3. AREAS OF CONCERN

1. Soil testing was due to be completed in Spring 2019 and were not done as of the date of the inspection.

4. LIST OF DOCUMENTS RECEIVED FROM FACILITY

1. None.

5. LIST OF ATTACHMENTS

A) [redacted] Family Farm Photo Log.
B) Aerial photograph of [redacted] Family Farm with buildings and waterways labeled.
C) Aerial photograph of [redacted] Family Farm and hillside and intermittent unnamed tributary to south.

[redacted] Family Farm – Photo Log
Attachment A
EPA Inspection April 30, 2019
All photos taken by Cheryl Burdett, with an Olympus Stylus TG-4 camera

EPA began the walkthrough portion of the inspection south of the Holding Area at the Solids Separation Basin that was constructed south of the Holding Area. Facility personnel dammed up an area north of the Holding Area to collect manure and process wastewater that flows from areas on the north side of the facility. These areas include the Silage Pad, the Holding Barn and Open Feedlot north of the Holding Area. Facility personnel call this dammed-up area north of the Holding Area the Settling Basin.

Precipitation transports manure and process wastewater to the south from areas north of the Holding Area. The manure and process wastewater accumulates in the Settling Basin and solids settle out. When the Settling Basin is full, facility personnel remove a board over a hole in the wall and the liquid flows to the south through the Holding Area and to a constructed basin south of the Holding Area called the Solids Separation Basin. Facility personnel put a pump in the Solids Separation Basin and pump the liquid to a tanker. They then move the tanker to the Earthen Storage Structure and pump the liquid into it.

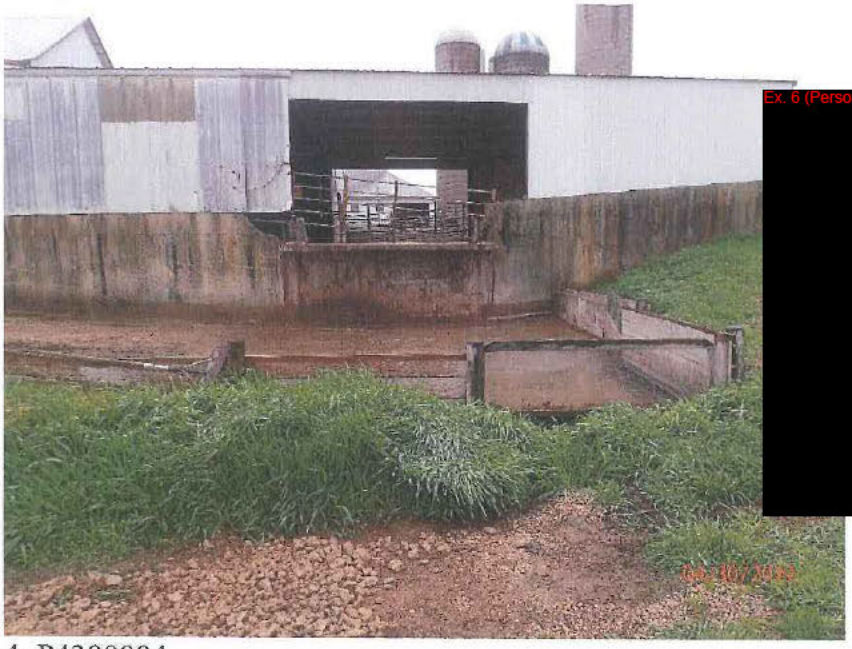
The Solids Separation Basin is not water-tight. An open section at the southeast corner of the basin has screening to hold back solids but allows process wastewater to flow to the south and down a channel in the front yard to East Welch Road. A culvert under East Welch Road conveys the flow to the south and to a hillside. The flow continues through a channelized waterway to the south until the slope of the hillside decreases. The flow then spreads out and diminishes in the vegetation until there is no additional flow down the hillside.

1: P4300001
Description: Solids separation happens in the Solids Separation Basin south of the Holding Area. Process wastewater flows out of the basin at the southeast corner and down the front yard. Liquid is also pumped out of the basin to a tanker truck which moves it to the Earthen Storage Structure.
Location: South of the Holding Area.
Camera Direction: East
Date/Time: April 30, 2019 11:39 A.M.

2: P4300002
Description: Solids separation happens in the Solids Separation Basin south of the Holding Area. Process wastewater flows out of the basin at the southeast corner and down the front yard.
Location: South of the Holding Area.
Camera Direction: East
Date/Time: April 30, 2019 11:39 A.M.

EPA observed the channel in the front yard that transports flow from the Solids Separation Basin to the culvert under East Welch Road.

3: P4300003
Description: Process wastewater flows out of the Solids Separation Basin at the southeast corner and down the front yard.
Location: South of the Holding Area.
Camera Direction: East
Date/Time: April 30, 2019 11:39 A.M.



4: P4300004
Description: Solids Separation Basin south of the Holding Area.
Location: South of the Holding Area.
Camera Direction: North
Date/Time: April 30, 2019 11:42 A.M.

5: P4300005
Description: Process wastewater flows in a channel down the front yard to the south.
Location: South of the Holding Area.
Camera Direction: South
Date/Time: April 30, 2019 11:42 A.M.

6: P4300006
Description: Rocks in the channel outside the screen at the southeast corner of the Solids Separation Basin.
Location: South of the Holding Area.
Camera Direction: Down
Date/Time: April 30, 2019 11:42 A.M.

7: P4300007
Description: The channel in the front yard has manure solids in it from the process wastewater that flowed out of the Solids Separation Basin.
Location: South of the Holding Area
Camera Direction: South
Date/Time: April 30, 2019 11:44 A.M.

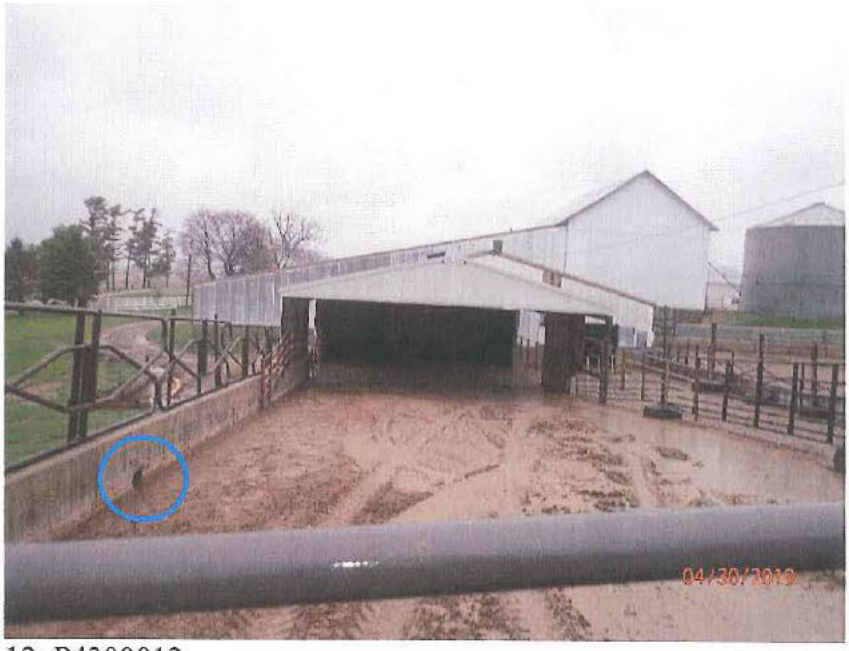
8: P4300008
Description: The channel in the front yard continues to the fenceline north of East Welch Road.
Location: South of the Holding Area at the property line with East Welch Road.
Camera Direction: South
Date/Time: April 30, 2019 11:46 A.M.

9: P4300009
Description: Process wastewater flows down the front yard and to a culvert pipe under East Welch Road.
Location: South of the Holding Area at the property line with East Welch Road.
Camera Direction: South
Date/Time: April 30, 2019 11:47 A.M.

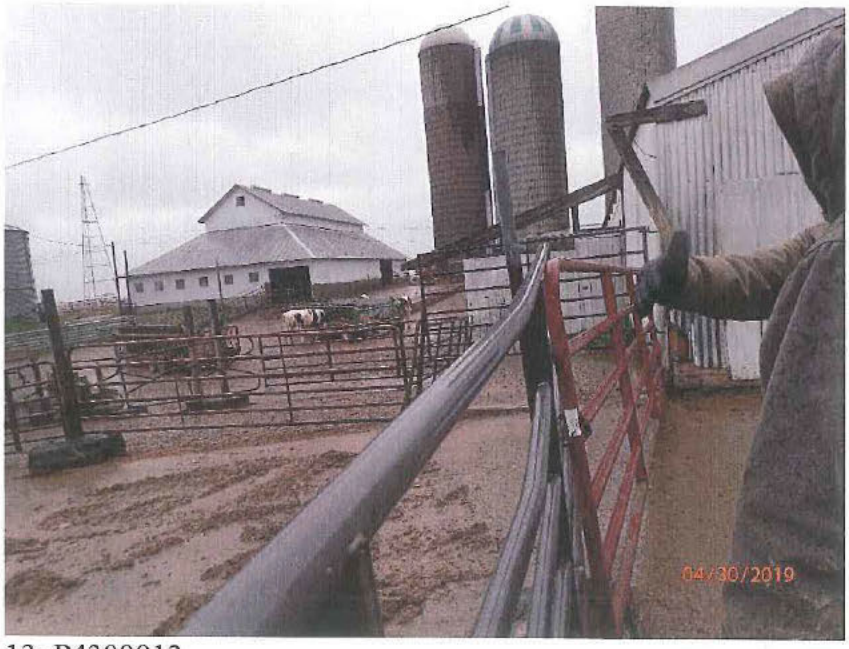
EPA then walked back north to the Cattle Walkway and observed a push off ramp on the Cattle Walkway. EPA observed that there was no containment for manure and process wastewater from the push off ramp. A channel in the yard below the ramp indicated that flow off the push off ramp would join with the flow from the Solids Separation Basin and flow south down the channel in the front yard.

10: P4300010
Description: Push off ramp on the south side of the Cattle Walkway. There is no containment for manure and process wastewater from the ramp and to the yard below.
Location: South of the Cattle Walkway/
Camera Direction: East
Date/Time: April 30, 2019 11:48 A.M.

11: P4300011
Description: There is no containment for manure and process wastewater from the push off ramp and to the yard below.
Location: Cattle Walkway.
Camera Direction: East
Date/Time: April 30, 2019 11:48 A.M.



12: P4300012
Description: Looking toward the Holding Area from the Cattle Walkway. EPA observed a weep hole in the concrete wall of the Cattle Walkway (blue circle).
Location: Cattle Walkway.
Camera Direction: West
Date/Time: April 30, 2019 11:49 A.M.



13: P4300013
Description: Open Feedlot north of the Holding Area is sloped to the south toward the Holding Area.
Location: Cattle Walkway.
Camera Direction: Northwest
Date/Time: April 30, 2019 11:49 A.M.

14: P4300014
Description: Looking to the yard north of the Cattle Walkway and west of the Free Stall Barn.
Location: Cattle Walkway.
Camera Direction: Northeast
Date/Time: April 30, 2019 11:52 A.M.

15: P4300015
Description: EPA observed manure and process wastewater flowing under the fencing and off the Cattle Walkway to the yard below.
Location: Cattle Walkway.
Camera Direction: South and down
Date/Time: April 30, 2019 11:53 A.M.

EPA walked on the Cattle Walkway to the east and to the Free Stall Barn. EPA walked through the Free Stall Barn from west to east and observed the center pit in the center of the barn where facility personnel scrape the manure and process wastewater to. Once in the pit, the manure and process wastewater flows to a reception pit to the east and just outside the Free Stall Barn. From there, the manure and process wastewater is pumped to the Earthen Storage Structure.

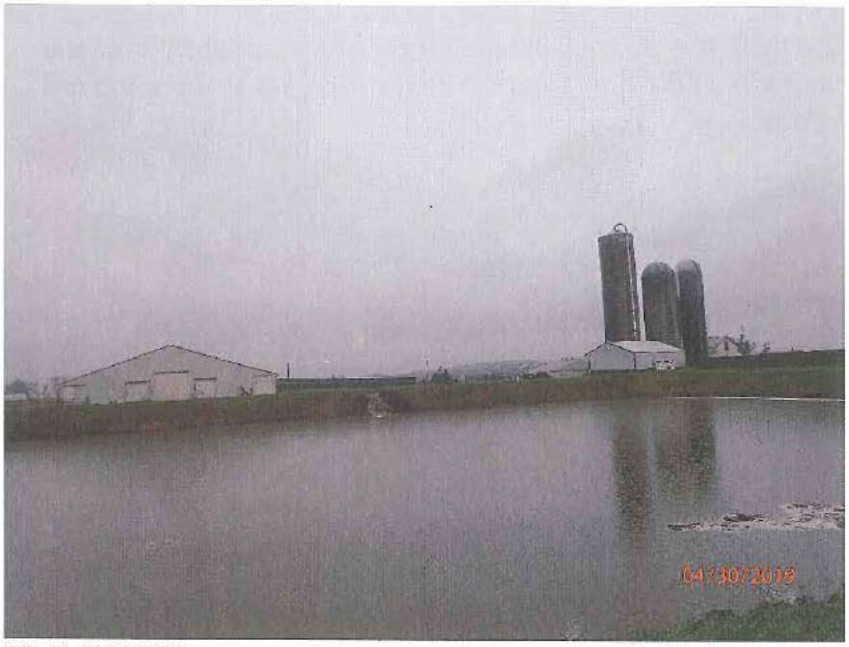
16: P4300016
Description: Inside the Cattle Walkway. EPA observed that there was no containment to prevent manure and process wastewater from leaving the Cattle Walkway under the side boards.
Location: Cattle Walkway.
Camera Direction: West
Date/Time: April 30, 2019 11:55 A.M.

EPA walked around the berm of the Earthen Storage Structure. The vegetation on the berm was mowed and EPA did not observe any structural issues. EPA observed that the level of freeboard was over six feet.

17: P4300017
Description: Earthen Storage Structure is at the north side of the facility.
Location: North of the Free Stall Barn.
Camera Direction: Northwest
Date/Time: April 30, 2019 12:01 P.M.

18: P4300018
Description: There was over six feet of freeboard in the Earthen Storage Structure on the day of the inspection.
Location: North of the Freestall Barn.
Camera Direction: North
Date/Time: April 30, 2019 12:01 P.M.

19: P4300019
Description: Vegetation was mowed and EPA did not observe any rodent holes or woody growth on the berm of the Earthen Storage Structure. Pipe from the reception pit east of the Freestall Barn outlets in the southeast corner of the Earthen Storage Structure (denoted by a blue circle).
Location: Southeast corner of the Earthen Storage Structure.
Camera Direction: North
Date/Time: April 30, 2019 12:02 P.M.



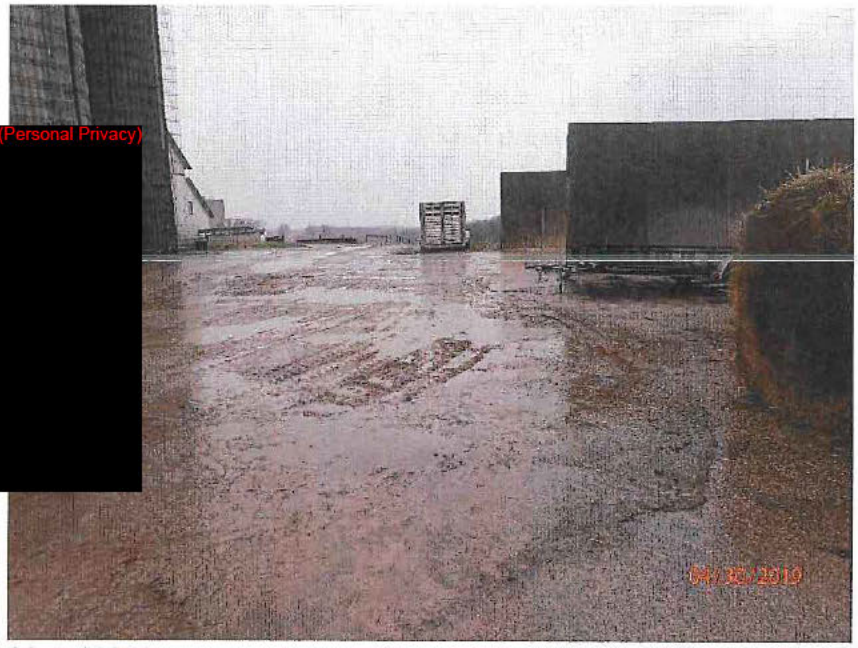
20: P4300020
Description: Displaced dirt area on berm of Earthen Storage Structure is where tanker trucks access the storage structure to pump the manure and process wastewater.
Location: Northeast corner of the Earthen Storage Structure
Camera Direction: Southwest
Date/Time: April 30, 2019 12:05 P.M.

EPA then walked west to the Silage Pad. The silage on the north side of the pad was covered with a tarp and the tarp was held down with tires. The silage was at least five feet from the edge of the concrete. EPA did not observe any silage leachate leaving the Silage Pad from the north.

21: P4300021
Description: Silage is kept covered and away from the north edge of the Silage Pad. Open face of the silage is on the south side.
Location: North side of the Silage Pad.
Camera Direction: West
Date/Time: April 30, 2019 12:07 P.M.

The open face of the silage is on the south side of the Silage Pad. EPA observed that the slope of the Silage Pad for the two west bunkers was to the west and that there was no containment for process wastewater from the Silage Pad to the west. EPA observed that the majority of the flow from the Silage Pad goes to the south and through the Open Feedlot north of the Holding Area.

Ex. 6 (Personal Privacy)



22: P4300022
Description: The open ends of the silage are in the bays to the right in the photo. Flow off the Silage Pad is to the south or west.
Location: South of the Silage Pad.
Camera Direction: West
Date/Time: April 30, 2019 12:09 P.M.

23: P4300023
Description: Commodities and silage bunkers on the Silage Pad. Flow off the Silage Pad is to the south or west.
Location: Southeast corner of the Silage Pad.
Camera Direction: West
Date/Time: April 30, 2019 12:09 P.M.

24: P4300024
Description: Looking at the open face of the silage in the bunker.
Location: South side of the Silage Pad.
Camera Direction: North
Date/Time: April 30, 2019 12:10 P.M.

25: P4300025
Description: Some flow from the Silage Pad goes to the west off the pad. EPA did not observe process wastewater off the west side of the Silage Pad reach a water of the U.S.
Location: South side of the Silage Pad.
Camera Direction: West
Date/Time: April 30, 2019 12:10 P.M.

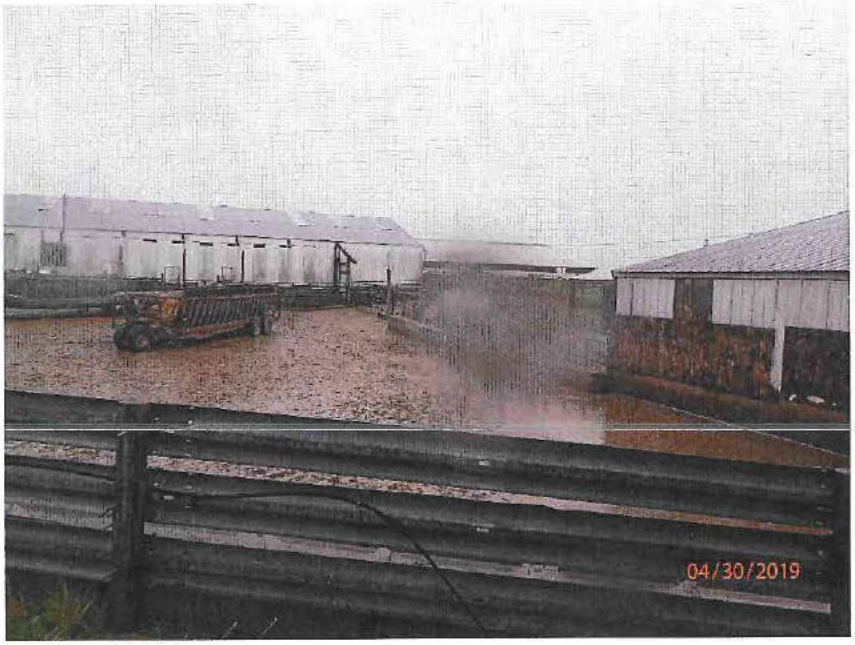
26: P4300026
Description: EPA observed process wastewater north of the silos flowing with precipitation to the south and through the Open Feedlot north of the Holding Area.
Location: South of the Silage Pad.
Camera Direction: Southwest
Date/Time: April 30, 2019 12:11 P.M.

27: P4300027
Description: EPA observed process wastewater from the silage flowing with precipitation to the west and south and then through the Open Feedlot north of the Holding Area.
Location: South of the Silage Pad.
Camera Direction: East
Date/Time: April 30, 2019 12:13 P.M.

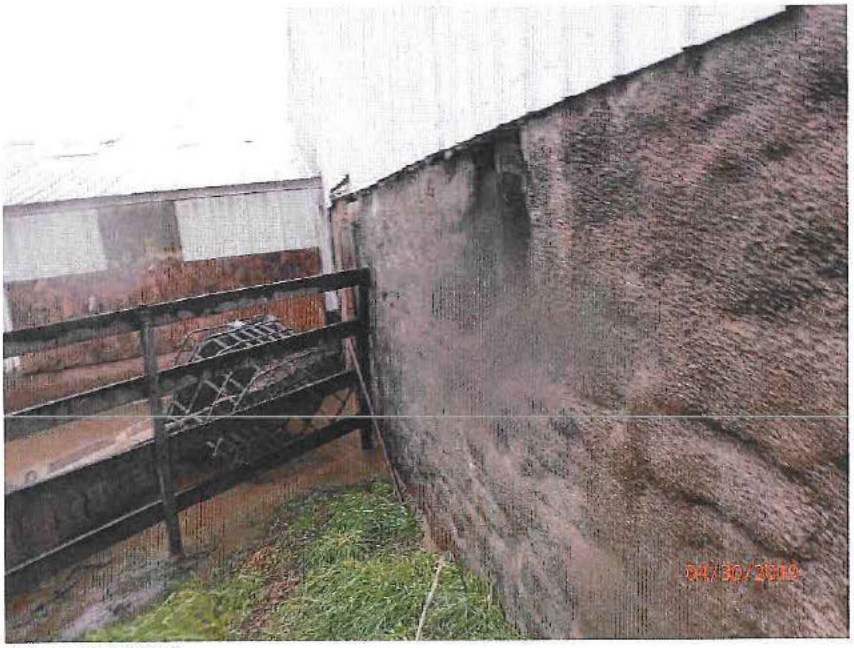
28: P4300028
Description: Looking to the west off the Silage Pad. An intermittent tributary is located over 0.6 miles to the west and EPA did not observe any runoff channels to that tributary.
Location: South of the Silage Pad.
Camera Direction: West
Date/Time: April 30, 2019 12:13 P.M.

29: P4300029
Description: Some flow off the Silage Pad flows to the west and to the hillside. EPA did not observe any flow reaching a water of the U.S. from process wastewater from the Silage Pad.
Location: Southwest of the Silage Pad.
Camera Direction: West
Date/Time: April 30, 2019 12:14 P.M.

EPA then observed the Settling Basin north of the Holding Area. This Settling Basin was created by utilizing the slope of the Open Feedlot north of the Holding Area and preventing flow from flowing through the Holding Area until wood blocking a hole in the wall is removed.

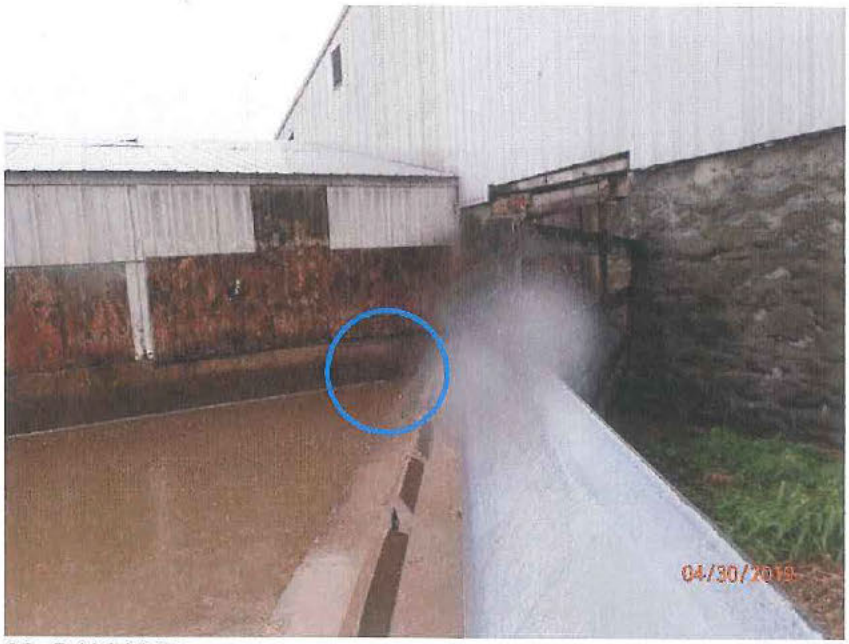


30: P4300030
Description: The facility created a Settling Basin that captures much of the flow off the Open Feedlot north of of the Holding Area. The facility personnel open the hole in the wall of the Holding Area wall and the flow goes through the Holding Area and to the Solids Separation Basin. When the flow reaches the Solids Separation Basin, a pump is utilized to move this water to a tanker truck and then to the Earthen Storage Structure.
Location: North of the Holding Area.
Camera Direction: East
Date/Time: April 30, 2019 12:16 P.M.



31: P4300031
Description: The facility created a dam on the north side of the Holding Area to capture precipitation flowing from the north by blocking a hole in the wall of the Holding Area. Facility personnel call this area the Settling Basin.
Location: North side of the Holding Area.
Camera Direction: South
Date/Time: April 30, 2019 12:16 P.M.

32: P4300032
Description: Water that flows south through the Open Feedlot north of the Holding Area is held until the facility is ready to pump it to the Earthen Storage Structure. They release the water and it flows through the Holding Area and to the Solids Separation Basin south of the Holding Area. A pump in that basin pumps the flow to a tanker truck which then transports the manure and process wastewater to the Earthen Storage Structure.
Location: North of the Holding Area.
Camera Direction: Southeast
Date/Time: April 30, 2019 12:16 P.M.



33: P4300033
Description: The wood in the blue circle denotes the location of the stopped-up hole for creating the dam north of the Holding Area.
Location: North of the Holding Area.
Camera Direction: Southwest
Date/Time: April 30, 2019 12:17 P.M.

EPA then walked to the south and observed the channel for flow down the front yard where it reached the culvert under East Welch Road. EPA crossed over East Welch Road and walked down the hillside observing the channelization for the flow down the hillside. The hillside property is owned by the facility owners.

34: P4300034
Description: Facility driveway west of the channel in the front yard. The channel is denoted by a blue arrow.
Location: South of the Old Milking Parlor.
Camera Direction: East
Date/Time: April 30, 2019 12:20 P.M.

35: P4300035
Description: After flowing under East Welch Road, flow from the Solid Separation Basin exits the culvert in the hillside. EPA walked to the bottom of the hillside and did not take photos until on the way back up.
Location: South side of East Welch Road.
Camera Direction: East
Date/Time: April 30, 2019 12:22 P.M.

EPA observed that there was flow in the channel but once the slope of the hillside decreased, the channel disappeared and the flow was spread out under the vegetation. EPA continued down the hillside and observed that the flow under the vegetation also disappeared. EPA walked all the way down the hillside to the intermittent unnamed tributary. EPA began documenting the conditions on the hillside on the way back up to the top.

36: P4300036
Description: The flow from the facility continues down a hillside on the south side of East Welch Road. An intermittent unnamed tributary at the bottom of the hillside is approximately 0.43 miles away. EPA walked down to the bottom of the hillside and observed the intermittent tributary. Photo is looking upstream at the intermittent unnamed tributary.
Location: At the confluence of the flow from the hillside with the intermittent unnamed tributary at the bottom.
Camera Direction: Southeast
Date/Time: April 30, 2019 12:36 P.M.

37: P4300037
Description: Looking downstream at the intermittent unnamed tributary.
Location: At the confluence of the flow from the hillside with the intermittent unnamed tributary at the bottom.
Camera Direction: Northwest
Date/Time: April 30, 2019 12:36 P.M.

38: P4300038
Description: At the bottom, the slope of the hillside flattens out and EPA could not distinguish a continuous pathway or channel from the flow at the top of the hillside.
Location: At the confluence of the flow from the hillside with the intermittent unnamed tributary at the bottom.
Camera Direction: North
Date/Time: April 30, 2019 12:36 P.M.

39: P4300039
Description: At the bottom, the slope of the hillside flattens out and EPA could not distinguish a continuous pathway or channel from the flow at the top of the hillside.
Location: At the confluence of the flow from the hillside with the intermittent unnamed tributary at the bottom.
Camera Direction: North
Date/Time: April 30, 2019 12:36 P.M.

40: P4300040
Description: Continuing to walk back north up the hillside, EPA did not observe any channelization or vegetation that appeared nutrient burned from the flow from the facility.
Location: On the hillside south of East Welch Road.
Camera Direction: Northeast
Date/Time: April 30, 2019 12:38 P.M.

41: P4300041
Description: The facility personnel stated that they harvest the vegetation from the hillside. They also watch for any channelization and if they see any, they fill it in.
Location: On the hillside south of East Welch Road.
Camera Direction: Northeast
Date/Time: April 30, 2019 12:39 P.M.

Facility personnel stated that they harvest the vegetation on the hillside and use it for bedding in the bedpack. Although there was over a half inch of rain the day of the inspection, EPA did not observe any flow of manure or process wastewater reaching the intermittent unnamed tributary at the bottom of the hillside.

42: P4300042
Description: Looking back toward the intermittent unnamed tributary at the bottom of the hillside (in the treeline). EPA did not observe any channelization or vegetation that appeared nutrient burned once the slope of the hillside decreased. In the flattest part of the hillside, approximately 0.25 miles from the facility, EPA did not observe standing water below the vegetation.
Location: On the hillside south of East Welch Road.
Camera Direction: Southwest
Date/Time: April 30, 2019 12:40 P.M.

43: P4300043
Description: Walking back north toward the facility, the slope of the hillside increased and there were taller grasses where the precipitation flowed to the south.
Location: On the hillside south of East Welch Road.
Camera Direction: Northeast
Date/Time: April 30, 2019 12:42 P.M.

44: P4300044
Description: Looking back toward the intermittent unnamed tributary from the hillside. EPA did not observe channelization of flow in the hillside once the slope decreased.
Location: On the hillside south of East Welch Road.
Camera Direction: Southwest
Date/Time: April 30, 2019 12:42 P.M.

45: P4300045
Description: Looking up the hillside from approximately 0.25 miles from the facility. At this location, EPA observed water under the grasses, but the water was spread out and shallow. The vegetation did not appear nutrient burned.
Location: On the hillside south of East Welch Road.
Camera Direction: Northeast
Date/Time: April 30, 2019 12:43 P.M.

46: P4300046
Description: Looking down the hillside from approximately 0.25 miles from the facility. At this location, EPA observed water under the grasses, but the water was spread out and shallow. The vegetation did not appear nutrient burned.
Location: On the hillside south of East Welch Road.
Camera Direction: Southwest
Date/Time: April 30, 2019 12:43 P.M.

47: P4300047
Description: EPA continued to walk north up the hillside south of East Welch Road. The distance from the facility is approximately 0.15 miles.
Location: On the hillside south of East Welch Road.
Camera Direction: North
Date/Time: April 30, 2019 12:45 P.M.

48: P4300048
Description: Looking south at the hillside from approximately 0.15 miles from the facility.
Location: On the hillside south of East Welch Road.
Camera Direction: Southwest
Date/Time: April 30, 2019 12:45 P.M.

49: P4300049
Description: As the slope of the hillside increased near the top (closer to East Welch Road), EPA documented the channel of flow from the north.
Location: On the hillside south of East Welch Road.
Camera Direction: Northeast
Date/Time: April 30, 2019 12:45 P.M.

50: P4300050
Description: Looking south from the same location as photo #49. EPA observed the channel of flow from the north to the south.
Location: On the hillside south of East Welch Road.
Camera Direction: South
Date/Time: April 30, 2019 12:45 P.M.

Ex. 6 (Personal Privacy)

51: P4300051
Description: EPA parked the vehicle to the west of the Old Milking Parlor.
Location: West of the Old Milking Parlor.
Camera Direction: East
Date/Time: April 30, 2019 12:50 P.M.

52: P4300052
Description: The Machine Shed west of the Old Milking Parlor.
Location: West of the Old Milking Parlor.
Camera Direction: West
Date/Time: April 30, 2019 12:50 P.M.

EPA concluded the walkthrough portion of the inspection at 12:50 P.M. EPA provided a closing conference to the facility personnel and exited the facility at 1:15 P.M.